



Upper Mississippi River Campaign
Main Office
2357 Ventura Drive, Suite 106
Woodbury, MN 55125
Tel: 651-739-9332
Fax: 651-731-1330
www.audubon.org

Great River Birding Trail
Coordinating Office
1707 Main Street, Suite 105
La Crosse, WI 54601
Tel: 608-784-2992
Fax: 608-784-4458

UMR Campaign Field Trip
Coordinating Office
P.O. Box 309
McGregor, IA 52157
Tel: 563-586-2621

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August 19, 2005

Don Hultman
Refuge Manager
Fish and Wildlife Service
Upper Mississippi River National Wildlife and Fish Refuge
51 East Fourth Street – Room 101
Winona, Minnesota 55987

Dear Mr. Hultman:

On behalf Audubon I am pleased to provide comments on the Draft Comprehensive Conservation Plan and Environmental Impact Statement for the Upper Mississippi River National Wildlife and Fish Refuge.

Audubon is a national conservation organization celebrating its 100th anniversary this year. Our mission is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity.

Through the work of our members, chapters, state offices and the Upper Mississippi River Campaign, we support habitat restoration, environmental education, and public policy decisions that result in restoring the health of the Mississippi River in Minnesota, Wisconsin, Iowa, Illinois and Missouri.

We recognize that the Mississippi River and the Driftless Area in this region are national treasures worthy of federal and state support, augmented by local, non-profit and private protection and restoration efforts.

We strongly believe that, were it not for the establishment and subsequent active management of the Upper Mississippi River National Wildlife Refuge, the river ecosystem from Wabasha, Minnesota downstream to Rock Island, Illinois would be significantly more degraded than it is. Instead, we are fortunate to still have today, in this reach of the river, the critical elements of a large floodplain river system necessary to enable us to restore some of what we have lost over time and improve habitat conditions over what they currently are.

Audubon believes that successful river restoration and long-term protection of the river will require a strong river habitat restoration program not only on the Upper Mississippi River National Wildlife and Fish Refuge, but also on your companion refuges and other public and private lands upstream and downstream on the Mississippi, Minnesota and Illinois Rivers. They are all part of this great Mississippi River flyway that is so critical to more than 300 bird species, many on our Audubon Watch List.

I. A Context for Refuge Management on the Upper Mississippi River

How well the refuge is managed will not only be a function of decisions made by the U.S. Fish and Wildlife Service, but by other agencies who share management responsibility for the river and bluffslands in Minnesota, Wisconsin, Illinois and Iowa. How well the refuge is managed will also be determined by the extent to which the United States Congress provides funding for habitat restoration, refuge staff and infrastructure and operation and maintenance of habitat projects on the refuge.

Audubon believes that 4 key federal programs and complementary efforts by the states must be authorized and/or funded for the Upper Mississippi National Wildlife and Fish Refuge to be managed well and restored as a healthy ecosystem. It will be critical that the following programs that directly affect habitat conditions within the refuge boundaries be fully supported:

1. The existing Upper Mississippi River Environmental Management Program (EMP) should be fully funded through the U.S. Army Corps of Engineers budget process each year and that the program, with its complimentary habitat rehabilitation and enhancement and long-term monitoring programs be continued.
2. The Navigation and Environmental Sustainability Program (NESP) ecosystem restoration program should be authorized and fully funded by Congress as recommended by Chief of Engineers.
3. The Pool Plans adopted by the multi-agency River Resources Forum, and based upon the report, "A River that Works and A Working River" be implemented, with high priority to projects that will benefit the refuge.
4. The United States Congress should meet the funding needs of U.S. Fish and Wildlife Service to fully implement the final Comprehensive Conservation Plan, including providing adequate funds to support ongoing operation and maintenance of habitat rehabilitation and enhancement projects that are completed on the refuge.
5. Each state along the river must seek and provide funds that will enable habitat restoration work to take place on lands and waters adjacent to or helpful to the refuge but not owned and managed by the refuge. Federal/Non-Federal cost sharing is typically required for habitat restoration on non-federal lands. To truly be successful in our efforts to restore the river and its refuges, each state must

seek and provide means to do habitat restoration projects on non-federal lands. Non-governmental organizations working along the river can also help in meeting non-federal cost share requirements.

In addition, more broadly, it will be important that the federal government continue to provide strong support for the Clean Water Act, the Endangered Species Act and, as it develops the 2007 Farm Bill, that strong provisions be included to target and provide adequate funding for programs to reduce sediment and nutrient loading into the Mississippi River from its tributary streams and watersheds.

Clearly, supporting a healthy refuge with diverse habitat conditions supporting many life forms and many uses will require good decision-making both by people and agencies working within the refuge boundaries as well as along the river and in its watersheds.

II. The Relationship between the Refuge and the Audubon Important Bird Area Program:

Audubon is in the process of evaluating several reaches of the Mississippi River for designation as Audubon Important Bird Areas (IBAs). (Go to <http://www.audubon.org/bird/iba/> to learn more about this national effort.) Important Bird Area Coordinators working in Minnesota, Wisconsin, Illinois and Iowa have each indicated that there are several river reaches that are candidates for this designation. When an area is officially designated an IBA, Audubon works with the public and/or private landowners to develop conservation plans, establish "volunteer support groups" to help protect the area, and long term monitoring programs are developed for these areas to assess whether or not our conservation efforts are working.

The IBA program is a global effort to identify areas that are most important for maintaining bird populations, and focus conservation efforts at protecting these sites. In the U.S. the IBA program has become a key component of many bird conservation efforts spearheaded by the USFWS including: Partners in Flight, North American Waterbird Conservation Plan, and the U.S. Shorebird Conservation Plan.

Audubon will continue to work with the Refuge staff as we evaluate when and where IBA status may apply on the Refuge and in the subsequent conservation and monitoring efforts for those areas.

III. Comments about the Draft CCP and EIS – Alternative D (Current Preferred Alternative):

Audubon provides the following comments within the context of the high degree of potential the Upper Mississippi River holds for IBA designation by Audubon as noted above, and in recognition that the management of the refuge is affected by a wide range of actions and decisions by others, both within the refuge boundaries as well as beyond, reaching far into the river's watershed.

Audubon attended five of the public meetings and three of the public workshops held to obtain public input on this document. At those events we provided informal input about the document and specific recommendations. In addition to the comments and input we provided, we are providing the following formal comments for your consideration, recognizing that, since the release of this draft, a subsequent "Alternative E" document will be released to reflect the response of the Service to the extensive public comment. Audubon reserves the right to comment on the "Alternative E" document when it is released as well.

The following comments focus specifically on the "Alternative D – Preferred Plan, as described on pages 101-132 in the document.

- A. (Page 103) Audubon strongly supports acquisition from willing sellers of approximately 1000 acres of land per year as identified in the 1987 Master Plan. We recommend that the Service work closely with the Blufflands Alliance and Audubon to seek ways to leverage funds from various sources and to give high priority to acquiring in fee title or by easement, the bluffland parcels as identified in appendix G and as further evaluated by the Blufflands Alliance and Audubon.
- B. (Page 104) Audubon supports seeking Land and Water Conservation Funds of at least \$1.5 million per year to assist in the land acquisition effort.
- C. (Page 106) Audubon agrees fully with your statement that "The quality of the water on the Refuge is one of the most important factors influencing fish, wildlife, and aquatic plant populations and health, which in turn influence the opportunity for public use and enjoyment." We support the seven strategies outlined on this page. It is critical that more attention be paid to reducing sediment and nutrient loadings from tributary streams flowing into the Refuge. The filling in of Refuge backwaters is a particularly well-documented problem that is compounded by the construction of the locks and dams in the 1930s, resulting in the conversion of the free-flowing river into a series of pools that trap sediments in the slow-moving backwaters.
- D. (Page 106) Water level management has been proven to be an effective means of consolidating sediments and increasing the growth of emergent vegetation. Audubon supports the continuation of this process on as many pools as possible, in conjunction with the implementation of the pool plans on the refuge (see next comment). Audubon has, in the past, assisted with pre and post water level management bird monitoring, particularly with shorebird use of mud flats during pool drawdown. To the extent we can arrange staff and/or volunteer monitors, we would like to continue to assist with this effort.

- E. (Page 108) Audubon has been involved in the development of the pool plans and is very supportive of this interagency approach to management of the river and restoring habitat to achieve the “desired future condition” in each pool, yet in a manner that is cumulative to system-wide goals. The potential for implementing pool plans is perhaps most viable where there are refuge lands since the construction costs for habitat projects on the refuge are 100% federal compared to, in general, a 65% federal–35% non-federal cost sharing arrangement on non-refuge lands.

- F. (Page 109) Audubon has long held the position, consistent with the Service, that one of the key guiding principles for habitat management projects should be: “Management practices will restore or mimic natural ecosystem processes or functions to promote a diversity of habitat and minimize operations and maintenance costs.” This is consistent with the underlying principle of the Audubon/Upper Mississippi River Conservation Committee Report of 2000 entitled “A River That Works and A Working River.” As future habitat projects are considered and selected, this principle should apply whenever possible.

- G. (Pages 109-110) Monitoring of the status and trends of species on the refuge is critical to management. Audubon believes that there are several species of birds, including those on Audubon’s Watch List that should be monitored. We recommend that priority be given to the following Watch List species: Trumpeter Swans, Red-headed Woodpecker, Golden-winged Warbler, Blue-winged Warbler, and Prothonotary Warbler. Additionally, colonial waterbirds, and bottomland forest birds in particular the Red-shouldered Hawk should receive priority. Audubon would like to work with the Service, as part of our Important Bird Area program, to develop a monitoring program on the refuge that would engage both professional scientists as well as citizens in a monitoring program for these and possibly other species as well. We recommend to the Service that we work together to achieve this objective for the Refuge and for adjacent areas on the river and the uplands and bluffslands.

- H. (Pages 110-111) You note in your discussion of Threatened and Endangered Species Management on page 110 “Currently, the only species actively monitored on the Refuge are bald eagles,” we feel that continued monitoring of BOTH nesting and wintering bald eagle numbers is of high importance

- I. (Page 113) Audubon concurs that the Refuge should complete a Forest Management Plan to better address some of the unique

management issues related to the more than 50,000 acres of floodplain forest on the Refuge. We are particularly concerned about improving management for the Red shouldered Hawk, Prothonotary Warbler, and Red-headed Woodpecker.

- J. (Page 114) Audubon supports the protection and restoration of the nearly 6,000 acres of grassland on the Refuge, particularly the remnant tallgrass native prairie. Grassland-dependent birds have suffered significant population decline due to the disappearance of our grasslands in the Midwest where more than 65% of the 189,000 square mile Upper Mississippi River Watershed is now under cultivation for agricultural production. The efforts of the Refuge must be augmented by other efforts at grassland restoration on other public and private lands as well if we are restore significant tracts of native prairie and Oak Savanna in this region.
- K. (Page 115) Audubon supports the use of closed areas on the refuge to provide resting and feeding areas for migratory waterfowl. We support Alternative D and its recommendations to add additional closed area locations. We participated in several public meetings at which waterfowl hunters raised many concerns about the location and rules relative to closed areas and we expect that as many of these concerns as possible will be addressed by the Service. We have no specific recommendations for changes to the closed areas or the waterfowl hunting rules, as we believe these issues have been addressed well by others, including the states.
- L. (Page 123) Audubon also believes that providing wildlife observation and photography opportunities on the refuge should be a high-priority objective of the Refuge Comprehensive Conservation Plan. This non-consumptive use of the refuge provides important opportunities to build a constituency for the Refuge and the river. Wildlife observation is helpful to local and regional economic development. Audubon's Great River Birding Trail program has resulted in the printing and distribution of more than 400,000 maps showing great places to bird from the Mississippi River headwaters downstream to below Cairo, Illinois. Audubon will soon be evaluating how best to continue the updating and distribution of these maps. We suggest that the Service and Audubon explore how better to use our collective resources to build and maintain support for interpretation, enjoyment and protection of the Refuge through this program.
- M. (Page 125) Audubon's Great River Birding Trail, Important Bird Area program and its Audubon Ark river education program all focus on the Mississippi River and its watershed. As part of the Service's strategy to "cooperate with existing interpretive and environmental education

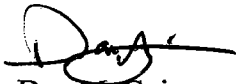
programs..." Audubon and the Service should work together to augment each other's education and interpretive offerings. In particular we should look at how our presence in La Crosse, Wisconsin, Marquette, Iowa, Dubuque, Iowa and the Quad Cities Iowa/Illinois, can be used to augment the efforts of the Refuge.

- N. (Page 132) We support the Refuge continuing to "look for creative ways to leverage efforts and funding for public information." Audubon has worked with the Refuge on several special events in the past (1999 Audubon Ark Kickoff in La Crosse, Wisconsin, refuge educational programs in the Marquette/McGregor area several years, the Audubon Ark tours 1999-2004), the Grand Excursion 2004, Ding Darling Day in 2004 and 2005, etc.) We will continue to work with the Refuge to help raise public awareness of the Refuge through our own and through joint events. We would welcome the opportunity to do so in a more coordinate fashion in the future.

IV. Other Comments

We understand that a new "alternative E" is being developed by the Service to address the many concerns and issues raised during this current round of public meetings and workshops and received by the Service in the form of emails and letters. We look forward to reviewing this new alternative and look forward to working with the Service to protect and restore this great refuge that is so critical to birds, fish, wildlife and people.

Sincerely,



Dan McGuinness
Director